

**Comments of  
The United Illuminating Company  
Re:**

**Raised House Bill No. 5214  
AN ACT CONCERNING A WIND TURBINE PILOT PROGRAM AT A CORRECTIONAL  
FACILITY  
Before the Energy & Technology Committee  
Legislative Office Building  
February 23, 2010**

Raised House Bill No. 5214 (the Bill) proposes to establish a pilot program for the use of wind turbines at a correctional facility in order to benefit the correctional facility and the municipality where the correctional facility is located

The United Illuminating Company ("UI" or "Company") supports the development of renewable resources in Connecticut; however the provisions of this proposed bill raise issues of fairness and can result in the reallocation of costs to customers other than those involved in the project.

The language of the bill is unclear as to the process of allocation of the energy. UI assumes that the correctional facility would utilize net metering for the energy from the windmill under established net metering protocols. Lines 9 through 12 then propose that any excess energy shall be allocated for the benefit of the municipality where the correctional facility is located. The specifics of how this secondary proposal would be accomplished can create a shift in cost to other customers. If the proposed bill intends that the entire output of the wind turbine is to be applied against the host municipality's total bill, including all non-generation costs, then the municipality would receive a benefit without a corresponding reduction in the transmission and distribution ("T&D") facilities necessary for the electric distribution company ("EDC") to serve all its customers. The installation of the wind turbines does not reduce the T&D facilities that the EDC must have on hand to serve its customers. These T&D requirements and associated costs remain the same. Yet, if the municipality's entire bill is netted out against the energy output of the renewable facility, the municipality will be paying less for these T&D facilities – which means that all other customers of the EDC will be paying more than they would if the wind turbines had not been installed. This shift in cost burdens presents a fundamentally unfair outcome for all other ratepayers.

There also could be issues with respect to ISO-NE's load settlement process. The ISO-NE load settlement process is used to develop the load values reported to ISO-NE. Load settlement is a complex, automated process based upon settlement of individual metered locations, not aggregated locations as contemplated by the provisions of this bill. The basic foundation of that process is that each meter (or delivery) point is one customer. There is no mechanism in the current process for performing aggregation. Manual intervention is likely the only way to accommodate what is envisioned by the proposed bill. Any manual intervention dramatically increases the opportunity for error and, given the complications noted above (and ISO-NE load data submission timelines), accuracy may be unattainable.

For these reasons, UI suggests that the facility's output be netted against only the energy (i.e., generation component) portion of the State's correctional facility bill and not shared with other customers, in this case the host municipality.